

CHAITMAN LLP

465 Park Avenue
New York, New York 10022
Phone & Fax: (888) 759-1114
Helen Davis Chaitman
Gregory M. Dexter
hchaitman@chaitmanllp.com
gdexter@chaitmanllp.com

*Attorneys for Defendants Carol Nelson,
Stanley Nelson, and Helen Saren-Lawrence*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

CAROL NELSON, individually and as joint tenant;
and STANLEY NELSON, individually and as joint
tenant,

Defendants.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04377 (SMB)

Adv. Pro. No. 10-04658 (SMB)

v.

CAROL NELSON,

Defendant.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

HELENE SAREN-LAWRENCE,

Defendant.

Adv. Pro. No. 10-04898 (SMB)

DECLARATION OF HELEN DAVIS CHAITMAN

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am partner with Chaitman LLP, counsel to numerous clawback defendants (“Defendants”). I am a member of the bars of New York and New Jersey, and of this Court.

2. I submit this declaration in further support of Defendants’, Helen Saren-Lawrence, Carol Nelson and Stanley Nelson, motion to adjourn the trial dates, *sine die*, pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure.

3. Attached hereto as **Exhibit A** is a true and accurate copy of the *Amended Initial Disclosures* served by the Trustee from November 21, 2018 through November 28, 2018, in various adversary proceedings.

4. Attached hereto as **Exhibit B** is a true and accurate copy of the *Trustee’s Amended Responses and Objections to Defendants’ First Set of Requests for Production of Documents and Interrogatories to the Trustee*, dated January 13, 2017.

5. Attached hereto as **Exhibit C** is a true and accurate copy of the *Trustee's Initial Disclosures* served on July 15, 2014 in Adversary Proceeding No. 10-04377, *Picard v. Carol and Stanley Nelson*; and Adversary Proceeding No. 10-04658, *Picard v. Carol Nelson*.

6. Attached hereto as **Exhibit D** is a true and accurate copy of the *Trustee's Initial Disclosures* served on July 6, 2015 in Adversary Proceeding No. 10-04898, *Picard v. Helene Saren-Lawrence*.

7. Attached hereto as **Exhibit E** is a true and accurate copy of the *Trustee's Responses and Objections to Defendants' Third Set of Requests for Production of Documents*, dated December 21, 2017.

8. Attached hereto as **Exhibit F** is a true and accurate copy of excerpts of the Transcript of Proceedings held before Hon. Judge Stuart M. Bernstein dated November 28, 2018.

9. Attached hereto as **Exhibit G** is a true and accurate copy of the Transcript of Proceedings held before Hon. Judge Stuart M. Bernstein dated October 10, 2018.

Dated: New York, New York
December 5, 2018

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
Helen Davis Chaitman
Gregory M. Dexter
hchaitman@chaitmanllp.com
gdexter@chaitmanllp.com
465 Park Avenue
New York, New York 10022
Phone & Fax: 888-759-1114

*Attorneys for Defendants Carol Nelson,
Stanley Nelson, and Helen Saren-Lawrence*